

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

United States of America

v.

RICHARD ADJEI BRONI  
LINDA MBIMADONG

Case No. 1-21-MJ-145

UNDER SEAL

*Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 1, 2019 in the city/county of Fairfax  
in the Eastern District of Virginia, the defendant(s) violated:

*Code Section*

18 U.S.C. § 371

*Offense Description*

Conspiracy to Commit Offenses Against the United States

This criminal complaint is based on these facts:

SEE AFFIDAVIT

☒ Continued on the attached sheet.

Reviewed by AUSA/SAUSA

Russell L. Carlberg, AUSA

*Printed name and title*



*Complainant's signature*  
Christopher D. Truslow, Special Agent  
Federal Bureau of Investigation

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
telephone \_\_\_\_\_ (specify reliable electronic means).

Date: April 23, 2021

City and state: Alexandria, Virginia

*Judge's signature*

Hon. Michael S. Nachmanoff, U.S. Magistrate Judge

*Printed name and title*